

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

CITY OF HARRISBURG, PA

Debtor.

Chapter 9

Case No. 11-06938

MOTION FOR ADMISSION *PRO HAC VICE*

National Public Finance Guaranty Corporation (“National”), by its undersigned counsel, hereby moves for the admission *pro hac vice* of Lawrence A. Larose, Esq., Samuel S. Kohn, Esq., and Sarah L. Trum, Esq. and, in support hereof, states as follows:

1. This motion is made pursuant to Bankr. M.D. Pa. L.B.R. 2090-1(b), and is filed on behalf of:

Lawrence A. Larose, Esq. (NY ID No. 1916766)
Samuel S. Kohn, Esq. (NY ID No. 3049749)
Sarah L. Trum, Esq. (NY ID No. 4167680)
WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166-4193
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2. Mr. Larose is a partner with Winston & Strawn LLP. He is a member in good standing of the bar of the State of New York, and he is admitted to practice in good standing before The United States District Court for the Southern District of New York. Mr. Larose has never been disciplined or censured by any court before which he has appeared. The certification of Mr. Larose in support of this motion is attached hereto as **Exhibit A**.

3. Mr. Kohn is a partner with Winston & Strawn LLP. He is a member in good standing of the bar of the State of New York, and he is admitted to practice in good

standing before The United States District Courts for the Southern and Eastern Districts of New York. Mr. Kohn has never been disciplined or censured by any court before which he has appeared. The certification of Mr. Kohn in support of this motion is attached hereto as **Exhibit B**.

4. Ms. Trum is an associate with Winston & Strawn LLP. She is a member in good standing of the bar of the State of New York, and she is admitted to practice in good standing before The United States District Courts for the Southern and Eastern Districts of New York and the Southern District of Texas. Ms. Trum has never been disciplined or censured by any court before which she has appeared. The certification of Ms. Trum in support of this motion is attached hereto as **Exhibit C**.

5. Good cause exists for the admission of Mr. Larose, Mr. Kohn, and Ms. Trum because National has requested that they represent National in the above-captioned matter.

6. This application is made on the motion of Gregory L. Taddonio, Esq., counsel to National and a member in good standing of the Bar of this Court.

WHEREFORE, for the foregoing reasons, National respectfully requests that this Court admit Lawrence A. Larose, Esq., Samuel S. Kohn, Esq., and Sarah L. Trum, Esq. to represent it *pro hac vice* in this action only.

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Dated: October 13, 2011

Respectfully submitted,

REED SMITH LLP

By: /s/ Gregory L. Taddonio
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*Counsel to National Public Finance
Guaranty Corporation*